



Canadian
Electricity
Association

Association
canadienne
de l'électricité

March 12, 2020

Mr. Claude Doucet, Secretary General
Canadian Radio-television and Telecommunications Commission
Les Terrasses de la Chaudière
1 Promenade du Portage
Gatineau, Québec J8X 4B1

RE: *Review of mobile wireless services*, Telecom Notice of Consultation CRTC 2019-57, 28 February 2019

Dear Mr. Doucet,

The Canadian Electricity Association (CEA) is a member-driven organization which represents the 40 largest electrical utilities of Canada including companies from all 13 provinces and territories. The CEA Board of Directors is comprised of CEOs from a wide representation of the member companies.

We were surprised to learn that, during the course of the appearing portion of the above-captioned proceeding, it was suggested that there is a lack of alignment between individual members with respect to the narrow issue on which the CEA appeared in the proceeding, *i.e.* access to Mobile Network Codes.

While each CEA member operates in jurisdictions with unique geographies, customer bases, and operating models, for which they develop, build, own, and operate advanced telecommunications networks accordingly, the lack of MNC access represents a common barrier. Investing in the continued modernization of advanced networks is essential and, in the regulated environment in which CEA members function, lack of MNC access is a bottleneck for all members.

We confirm that the CEA membership is aligned in its request that the CRTC direct the Canadian Steering Committee on Numbering to

(i) amend the *Canadian IMSI Subscription Guidelines* to define “critical infrastructure network operators” operating telecommunications networks in support of critical infrastructure, and allow such operators to acquire MNCs; and

(ii) submit the amended Guidelines for Commission approval at the earliest reasonable opportunity.

Sincerely,

Mike Marsh,
President & CEO, SaskPower
Chair of the Board, CEA

Francis Bradley,
President & CEO, CEA

